



DEPARTMENT OF VETERANS AFFAIRS
Medical Center
4150 Clement Street
San Francisco, CA 94121

AUG 28 2015

In Reply Refer To: 662/138

Carol Roland-Nawi, Ph.D
State Historic Preservation Officer
Office of Historic Preservation
Department of Parks & Recreation
1725 23rd Street, Suite 100
Sacramento, CA 95816

**Subject: Section 106 Consultation for the San Francisco Veterans Affairs Medical Center
Building 24 (Mental Health Clinical Expansion) and Building 20 Demolition Project**

Dear Ms. Roland-Nawi:

The U.S. Department of Veterans Affairs (VA) is proposing to relocate and consolidate the psychiatric care and sleep lab units (currently located in Buildings 203) at the San Francisco Veterans Affairs Medical Center (SFVAMC) Fort Miley campus into a new two-story plus a partial mechanical penthouse, 10,450 square foot building to be constructed directly east of Mental Health Building 8 and north of Parking Garage 212. The proposed building would occupy a 5,000 square-foot footprint; would be approximately a story lower than Building 8 in height; and would include pedestrian access on the west, south and north sides of the building. The proposed project site is located at the southeastern section of the SFVAMC within the National Register Historic District and along the western border of East Fort Miley (part of the Fort Miley Military Reservation National Register Historic District). The proposed project also includes the relocation of modular building T-35 and the demolition of Building 20, a contributor to the SFVAMC Historic District. The SFVAMC is located on a 29-acre site in northwest San Francisco (see Exhibits 1 and 2) and is a major tertiary care facility that serves as a VA regional referral center for specialized medical and surgical programs. The 12-acre SFVAMC Historic District (see Exhibit 3) lies within the boundaries of the SFVAMC Fort Miley Campus, and the proposed undertaking is located within the SFVAMC Historic District and adjacent to the Fort Miley Military Reservation Historic District (see Exhibit 4).

Per the requirements of the National Historic Preservation Act (NHPA) and the *Programmatic Agreement Among the U.S. Department of Veterans Affairs, Veterans Health Administration, San Francisco Veterans Affairs Medical Center, the Advisory Council on Historic Preservation, and the California State Historic Preservation Officer Regarding the Long Range Development Plan for the San Francisco Veterans Affairs Medical Center* (the PA) dated November 25, 2014 and executed January 9, 2015, the VA is contacting you to initiate consultation at the current stage of project development for the proposed Building 24 Mental Health Clinical expansion and Building 20 demolition project (the project). The project site for this sub-phase of the Long Range Development Plan (LRDP) is located within the SFVAMC Historic District and adjacent to the Fort Miley Military Reservation Historic District; therefore we are following the consultation procedures outlined under PA Review Categories A (Sub-phases Located within the SFVAMC Historic District) and C (Sub-phases Located Adjacent to the Fort Miley Military Reservation Historic District), as identified in Attachment B of the PA.

Section 106 consultation for this project was previously initiated on August 27, 2010, but was put on hold pending the Section 106 review of the LRDP. Because the project had been previously initiated and the design has already proceeded to the Construction Document stage, the VA is requesting that submittals one and two, as outlined in Review Categories A (Stipulation III.a.i and ii) and C (Stipulation III.c.i and ii), be combined for this project review process. This letter constitutes the review initiation for the proposed

undertaking per the directives of Review Categories A and C and includes a written description of the proposed sub-phase and any way in which it differs from what is described in the LRDP Finding of Effect (FOE) and how the design applies the *Secretary of the Interior's Standards for the Treatment of Historic Properties (SOISTHP)*. Additionally, this letter documents measures taken to avoid or minimize adverse effects on the SFVAMC Historic District and the Fort Miley Military Reservation Historic District. There are no responses to SHPO or the National Park Service Golden Gate National Recreation Area (GGNRA) comments included, because this letter constitutes the first submission and no comments have yet been solicited.

Prior Consultation

The VA initiated Section 106 consultation on August 27, 2010 prior to work being put on hold pending the Section 106 review of the LRDP and the development of the PA. Design drawings have previously been provided, and our agencies have had prior discussions regarding this project. The VA is now formally initiating consultation under the PA; however since this project has been in process for several years, the project is already to the Construction Drawings stage. While it falls outside of the typical protocol for the review process for new projects as outlined in the PA; the VA is submitting the project design at its current stage with this letter in an effort to be transparent and continue to move the project forward.

Proposed Sub-Phase Undertaking

Existing Conditions

The proposed sub-phase undertaking, identified as SFVAMC LRDP Sub-phase 1.8 in the PA (previously the project was identified as Phase 1.5 Building 24 Mental Health Clinic Expansion in the LRDP FOE) includes the construction of a new 10,450 square foot, two-story plus a partial penthouse building directly east of and behind Building 8 (a contributor to the SFVAMC Historic District) and adjacent to the Fort Miley Military Reservation Historic District. The project would also include the demolition of Building 20 (a contributor to the SFVAMC Historic District). T-35 (a non-contributing modular unit) would be relocated from the site to the northwest corner of the campus outside of the SFVAMC Historic District. The existing site consists of a flat paved parking area located between Building 8 and the campus' eastern boundary. Building 8 is a three-story, rectangular building designed in the Mayan Art Deco style of the campus. Building 20 is located at the eastern edge of the site behind Building 8. Building 20 is a one-story, wood-frame, stucco-clad rectangular storage building with garage doors punctuating the western elevation. A chain-link fence marks the campus property line, and a row of Monterey cypress trees stand just east of the site on the Fort Miley Military Reservation property.

Both Buildings 8 and 20 are listed as contributing resources to the SFVAMC Historic District. Unlike Building 8 and most of the contributing resources on the campus, Building 20 "does not follow the Art Deco motif of the SFVAMC campus" and "the design elements are Craftsmen in character." Building 20 was constructed in 1934 and an additional eight bays were constructed not long after the building's initial completion. According to the National Register nomination for the property, "the most significant change to Building 20 has been the replacement of the original doors and the construction of an addition on the southwest corner of the building. These changes have compromised the architectural integrity of the building to some degree: however, Building 20 retains enough integrity to be a contributing resource" (National Register of Historic Places, San Francisco Veterans Affairs Medical Center, San Francisco, San Francisco County, California, National Register #05001112, page 9.) While Building 20 is a contributing resource to the historic district, it is not one of the campus' most significant structures. Included in this submission are photographs of the existing site and exterior building conditions.

Site Improvements

Proposed project site improvements include the installation of a new concrete ramp and stair just east of Veterans Drive connecting to a new concrete sidewalk south of Building 8. New sidewalks at the north, east and south sides of the proposed building would connect to the existing sidewalks near Building 8, and new landscaped areas would be located at the north, west and south sides of the proposed building. At the eastern property line, a new fence would be installed atop a new poured concrete or concrete masonry unit retaining wall. The wall would continue with a turn to the west at the south end, connecting it to the exterior wall of the existing parking garage. Excavation behind the wall would be minimal (approximately two feet) to establish concrete form work or to install a layer of drainage rock. All work would be located on VA property and would not extend into Fort Miley, and no damage to trees roots would be anticipated.

Proposed Building

Proposed Building 24 would be steel framed and supported on conventional spread foundations, using cantilevered steel columns where required. Construction would utilize cast-in-place concrete at the ground level for the foundation.

The proposed building would be two-stories in height, which would be one-story lower than the adjacent Building 8. The main entrance would be located at the curved southwest corner entry tower. The entrance would be located between Building 8 and Parking Garage 212, and would be visible from Veterans Drive. The entrance would feature a glass curtain wall system set within a curved limestone panel clad or combination limestone panel and stucco clad wall. A metal canopy above the tower's ground level would identify the main entrance.

The building's primary elevations would face south and west. Both elevations would feature vertically organized fenestration separated by spandrels of opaque glass. The elevations are designed to be clad in a combination of a terracotta rain screen wall system, stucco, and limestone panels. The proposed color scheme for most materials would be similar to the existing off-white color and earth tones used throughout the campus. A secondary entrance would be located in the middle of the south elevation and would be protected by the overhang of curved wall section directly above the entrance. The mechanical equipment would be installed on the roof and would be shielded from view by a parapet. For fall protection, the parapet would continue on all sides of the building.

The building's secondary, rear and side elevations facing north and east would feature expanses of cement plaster clad walls with a dozen punched window openings. Finally, a ground floor exit on each elevation is articulated by a recession in the wall plane that extends the height of the building.

LRDP FOE Consistency

The proposed sub-phase undertaking was previously identified in the LRDP FOE as Phase 1.5 Building 24 Mental Health Clinic Expansion. The building was proposed to be three stories in height with a gross square footage of 15,600. The FOE project description states:

Phase 1.5 would construct a three-story building behind Building 8 (a contributor). Building 20 (a contributor) would be demolished as part of this phase. All proposed construction would occur within the SFVAMC Historic District boundaries. The planned development would alter the look and feel of the Historic District by removing a contributing resource and introducing modern elements into a part of the Historic District that is mostly intact and features a high level of integrity of setting and design (AECOM, Draft FOE for the LRDP SFVAMC, August 2012, 48).

The FOE determined the effect analysis of the project specifically relative to Building 8 to be as follows:

Demolition of Building 20, a contributor to the Historic District, would alter the setting and association of [Building 8]. Introduction of two buildings [Building 24 and Building 23] behind Building 8 may impair the design, workmanship, feeling, and setting of Building 8 if the new designs visually overpower the historic building or if connections between the buildings are not designed sensitively (AECOM, 60).

The FOE determined the effect analysis of the proposed project and the construction of Building 22 Hoptel on the Fort Miley Military Reservation Historic District to be as follows:

These projects would introduce atmospheric and visual changes; however, these changes would be somewhat obscured by the tree canopy (including thick Monterey cypress stands) along the western boundary of the Fort Miley Military Reservation Historic District. The Fort Miley Military Reservation Historic District would retain its integrity of location, design, character, and setting, and would continue to convey its significance (AECOM, 45-46).

Finally, Attachment B of the PA, which refers to the project as Sub-phase 1.8 Building 24 (Mental Health Clinical Expansion) and Building 20 Demolition, provides an additional Finding of Effect Analysis stating:

Sub-phase 1.8 would involve constructing a three-story building behind Building 8 to the east (a contributor). Building 20 (a contributor) would be demolished as part of this sub-phase. All proposed construction would occur within the SFVAMC HD boundaries. The proposed development would alter the look and feel of the HD by removing a contributing resource and introducing modern elements into a part of the district that is mostly intact and features a high level of integrity of setting and design (PA, Attachment B, 26).

Further, the PA states that the project has the potential to contribute to the adverse effect on historic properties due to the demolition of a contributor to the SFVAMC Historic District (Building 20). Also, the new construction would contribute to the adverse effect unless designed in accordance with the *SOISTHP* (PA, Attachment B, 26).

The proposed undertaking partially coincides with the LRDP FOE, as it includes the demolition of Building 20 and the construction of Building 24; however the proposed size of Building 24 has been reduced by a third. The proposed building is now only two stories in height, rather than three.

Application of the *SOISTHP*

1. A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.

Comment: The property's use will continue to support the campus' function as a VA medical facility.

2. The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.

Comment: The proposed project includes the removal of Building 20 which is a contributor to the SFVAMC Historic District. Therefore, historic materials and a feature that characterizes the property would be removed. The proposed project would not meet Standard 2.

Although Building 20, a garage, is a contributor to the District, it is small structure that does not embody the characteristic Mayan Deco style and has undergone significant changes which have compromised the architectural integrity of the building.

3. Each property shall be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or architectural elements from other buildings, shall not be undertaken.

Comment: The proposed design would not create a false sense of historical development. All proposed work would be clearly modern and would not include any conjectural features or architectural elements from other buildings.

4. Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved.

Comment: There are not any changes relative to the project location or adjacent contributing structures that have acquired historic significance in their own right.

5. Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a property shall be preserved.

Comment: The proposed project would demolish Building 20, therefore the building's minimal Craftsmen features, including wood rafters with decorate cut ends, will not be preserved. The project would not meet Standard 5.

Building 20 is quite simple in design and does not possess any Mayan Deco elements, which characterize the campus. The loss of distinctive features and finishes would be limited to the exterior stucco, wood rafters, and minor decorative curves at the end walls. The garage doors are not original to the building.

6. Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and other visual qualities and, where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence.

Comment: No deteriorated historic features would be repaired or replaced as part of this undertaking.

7. Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible.

Comment: No chemical or physical treatments would be undertaken on any historic materials as part of this project.

8. Significant archeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.

Comment: The Archaeological Data Recovery Plan Template for the SFVAMC is included Attachment C of the PA. The proposed project includes ground disturbing activities. If any discoveries are made during construction, then the PA procedures would be followed.

9. New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.

Comment: The proposed project would include the demolition of Building 20, and therefore would destroy historic materials that characterize the property. Building 8, which stands on Veterans Drive and generally blocks Building 20 from view, will not be altered as part of the proposed project. No physical connection will be made to Building 8 from the proposed building and no work is proposed to Building 8.

The proposed Building 24 would be clearly differentiated from the old, primarily by the exterior cladding, the fenestration, and the building massing. The proposed building height has been reduced to two stories, so as not to overpower the adjacent historic Building 8 or to appear too intrusive to the Fort Miley Military Reserve Historic District. The overall size and scale of the proposed building would be compatible to the surrounding buildings and appropriate for the location.

The new building does introduce new curved forms that are not typically found on the campus and includes new materials that have not previously been included in campus building projects. The elevation's visual grid pattern is modern in its appearance and is also a deviation from existing campus designs in the SFVAMC Historic District. While these architectural features are variations on existing campus designs and could be points of discussion in terms of compatible design alternatives, they would read as clearly modern, be differentiated from the old, and would have only minor visibility from the primary areas of the SFVAMC Historic District due to the proposed scale and site selection.

The design team sought to make the proposed building contemporary and compatible with the historic campus through the selection of the exterior cladding color scheme, which draws from the historic cream-colored plaster walls and terra cotta moldings, and with the organization of the windows on the proposed west and south elevation which are grouped vertically with opaque spandrel panels reminiscent of the typical historic campus fenestration treatment of vertically aligned units with terra cotta spandrel panels.

From the Fort Miley Military Reservation Historic District, the proposed building would be screened significantly by an existing stand of Monterey cypress and the topography, and would have little visual impact on the historic district. Further, the east, rear elevation facing the Fort Miley Military Reservation Historic District would be quite similar to the existing east elevation of Building 8, with the proposed painted plaster surface treatment and punched window openings. Therefore, it does not appear there would be a significant visual change to the Fort Miley Military Reservation Historic District.

Overall, the demolition of Building 20 would not comply with Standard 9. The proposed Building 24 design would comply with Standard 9, as the building would be of a compatible size and scale, and would include architectural features that derive from interpretations of the historic campus building, yet are clearly modern.

10. New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

Comment: The proposed new building would be free standing and would not connect to any adjacent historic building; therefore if it were to be removed in the future the essential form and integrity of the SFVAMC Historic District, Building 8 and the Fort Miley Military Reservation Historic District would remain unimpaired.

Findings

Not all items outlined in PA Stipulation III Review Categories A and C have been able to be addressed in the current submission. The Historic District Design Guidelines, as prescribed in the PA, have not yet been completed; therefore the Design Guidelines were not applied (Stipulation III.a.ii.1.a. and Stipulation III.c.ii.1.a.). Additionally, because submissions one and two are combined within one document no comments have been solicited or received from the SHPO, GGNRA, or any Consulting Parties to date; therefore no comments have been addressed by the SFVAMC as part of the formal PA process (Stipulation III.a.ii and Stipulation III.c.ii). The SFVAMC has been meeting with GGNRA regarding several projects along the campus' eastern border. A brief summary of these meetings is included below, under Public Participation.

Measures that were taken to comply with the *SOISTHP* and minimize the adverse effects on the SFVAMC Historic District include:

- Lowering the proposed building height from three stories to two stories;
- Locating the majority of building behind Building 8 and out of view from most of the SFVAMC Historic District;
- Not physically connecting the proposed building to Building 8;
- Selecting a compatible color scheme;
- Employing compatible cement plaster cladding at the secondary elevations;
- Vertically organizing the primary fenestration in reference to the historic fenestration patterns; and
- Exploring a fencing design alternative to chain-link at the eastern boundary.

Due to the demolition of Building 20 the overall project does not comply with the *SOISTHP*, and the sub-phase will contribute to the adverse effect on historic properties. However, the proposed design for the new Building 24 would comply with *SOISTHP*, and a minimization of adverse effects due to the introduction of modern elements within the SFVAMC Historic District would be achieved.

Measures prescribed in the PA to mitigate the adverse effects on historic properties, including the effects of the demolition of Building 20 and the new construction within the SFVAMC Historic District include the following:

- Development of Historic District Design Guidelines;
- Development of a Historic Landscape Study;
- Establishment of a Public Interpretation Program; and
- Preparation of a Historic Preservation Treatment and Maintenance Plan.

None of the identified documents listed above have been completed, however under Stipulation IV.e., the PA allows for the SFVAMC to continue to consult on individual LRDP sub-phases as the Mitigation Measures are being developed.

Public Involvement

In accordance with our responsibilities under the PA, the SFVAMC will post this submission to its LRDP Section 106 website and notify all other Consulting Parties within 15 days of transmittal to the State Historic Preservation Office (SHPO). Following the receipt of acknowledgement and comments from SHPO, the SFVAMC will post the response to the SFVAMC website and notify Consulting Parties.

Under the stipulations of Review Category C: Sub-phases Located Adjacent to the Fort Miley Military Reservation Historic District, the SFVAMC will provide GGNRA with a written and graphic description of the sub-phase design and invite GGNRA to meet to discuss the proposed sub-phase and design. GGNRA will provide written comments to the SFVAMC and the comments will be posted on the LRDP website and Consulting Parties will be notified of the posting.

The SFVAMC has been meeting with GGNRA regularly for the last few months to establish a better review and comment process for projects potentially impacting the Fort Miley Military Reservation Historic District and to improve the overall communication between the two agencies regarding such projects. Previous meetings have focused primarily on the design and construction of the proposed subject building (Building 24) and proposed Building 23, which would also be located behind Building 8, but directly north of the Building 24 site. The meetings have included discussions on potential project impacts on each facility and methods for effectively facilitating project comments between each organization. Meetings, such as these, aim to help our organizations identify goals early in the process and provide a venue for comments on future projects.

Items that were specifically discussed in recent meetings include the appearance of the back of Building 24, the location of a pedestrian trail providing access between the two sites, the location of the proposed retaining wall, and the appearance of the proposed fencing atop the retaining wall. The SFVAMC agreed to direct the design team to detail a deeper reveal for the windows at the back of Building 24, to relocate the pedestrian access to the GGNRA-approved location, to keep all work on the SFVAMC property, and to study fencing alternatives. At least one more meeting between the agencies is anticipated in regards to the Building 24 project.

Summary

With this letter, the VA would like to initiate the review of the SFVAMC Building 24 (Mental Health Clinical expansion) and Building 20 demolition project in accordance with the PA under Review Categories A and C and in compliance with Section 106 of NHPA. We request your comments and/or guidance specific to this sub-phase, and we request your concurrence with the combination of the first two submissions for Sub-phase 1.8 for which consultation had already been initiated in 2010.

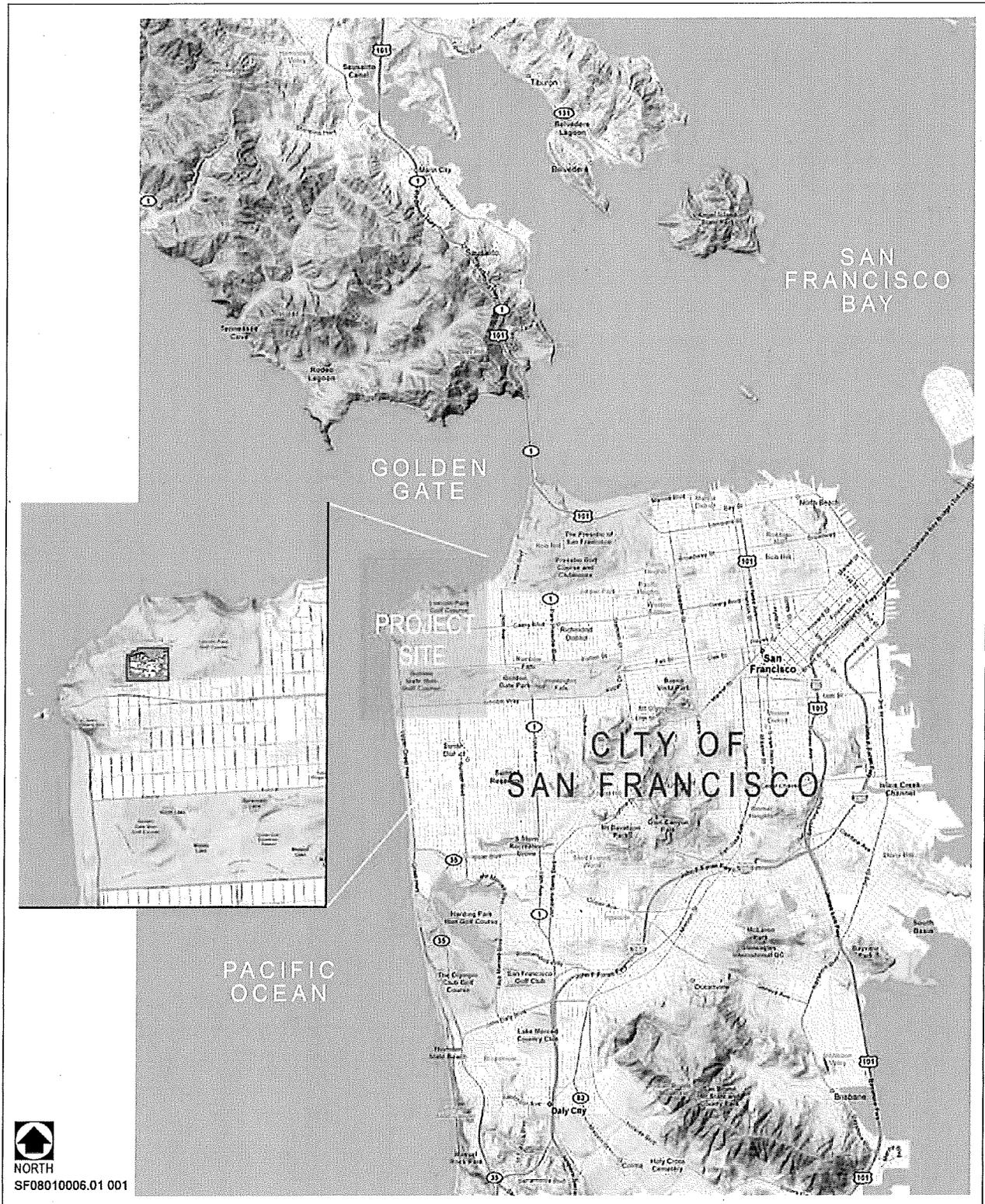
Should you have any questions about this project, please contact Robin Flanagan, Planning Office at (415) 750-2049.

Sincerely,



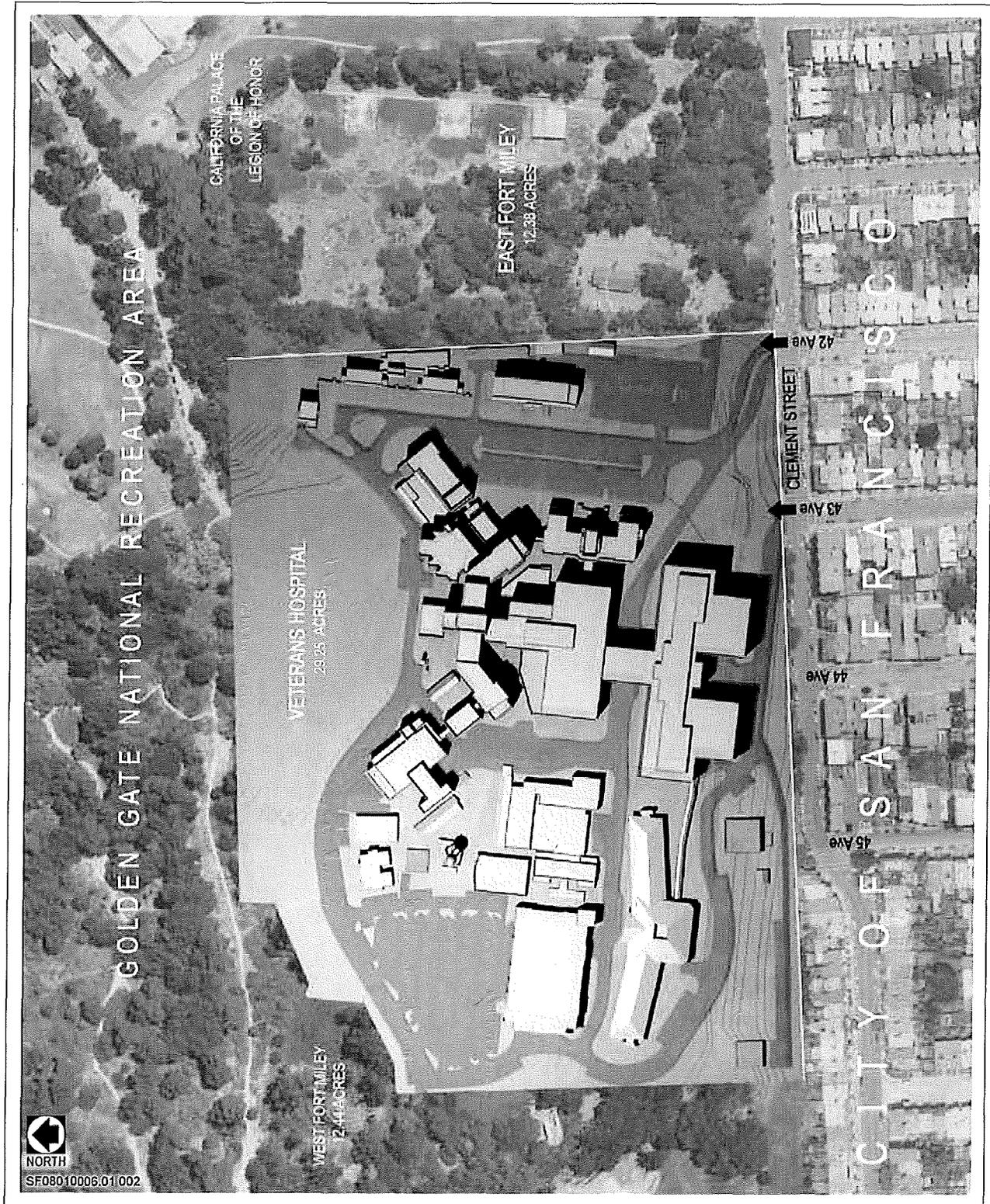
Bonnie S. Graham, MBA
Medical Center Director

Attachments: Exhibit 1 (Location of SFVAMC Fort Miley Campus within Urban Context of San Francisco)
Exhibit 2 (Existing SFVAMC Fort Miley Campus)
Exhibit 3 (SFVAMC Historic District)
Exhibit 4 (Approximate Project Limits)
Historic and Existing Conditions Photographs
Selected Construction Documents and Project Renderings



Source: USVA, 2010

Exhibit 1: Location of SFVAMC Fort Miley Campus within Urban Context of San Francisco



Source: USVA, 2010

Exhibit 2:

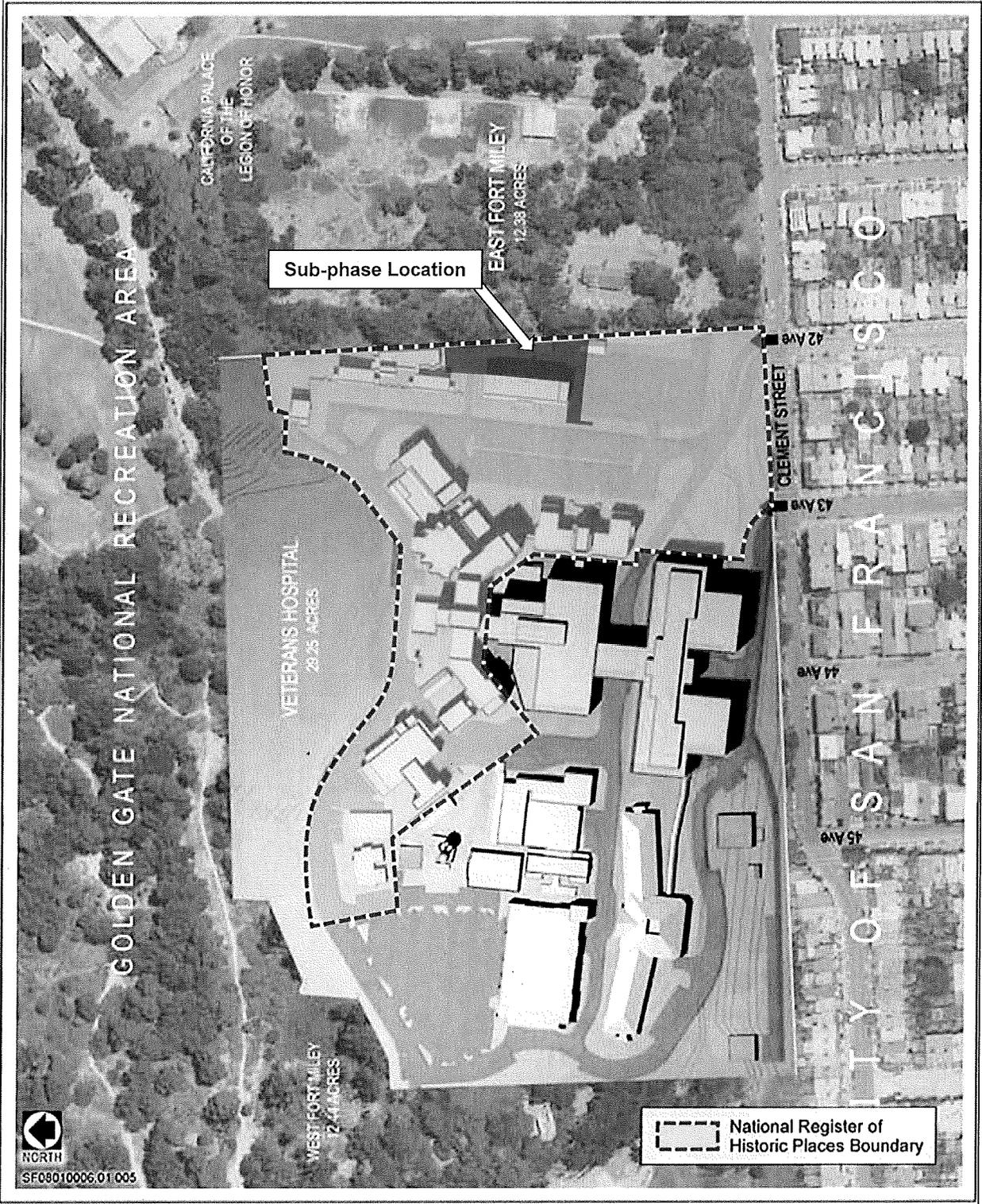
Existing SFVAMC Fort Miley Campus



Source: SFVAMC Institutional Master Plan

Exhibit 3:

SFVAMC Historic District



Source: SFVAMC Institutional Master Plan (Altered by Author)

Exhibit 4:

Sub-phase Location

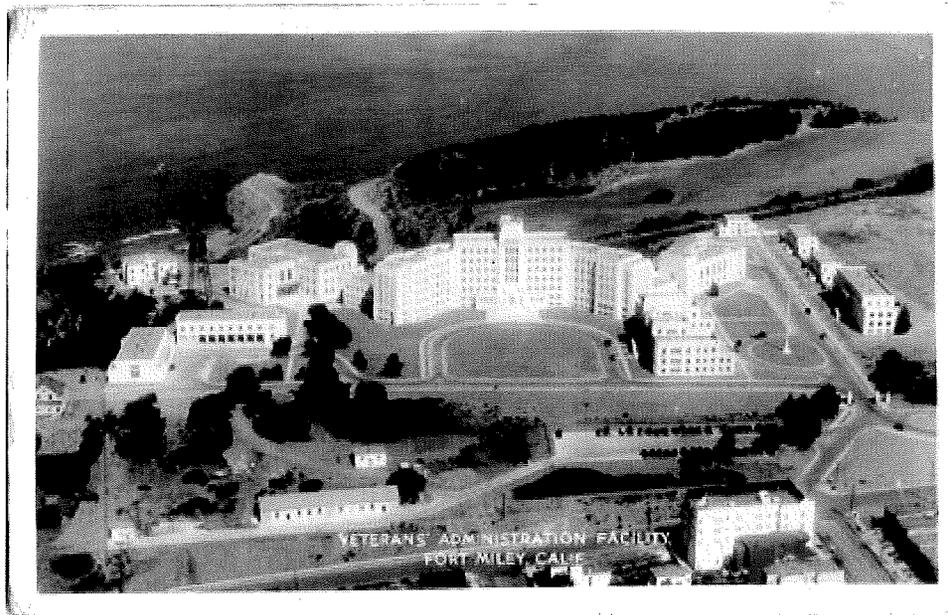


Figure 1: Aerial view of the Fort Miley campus c. 1935. Note Building 8 at the right.
Source: San Francisco Public Library.

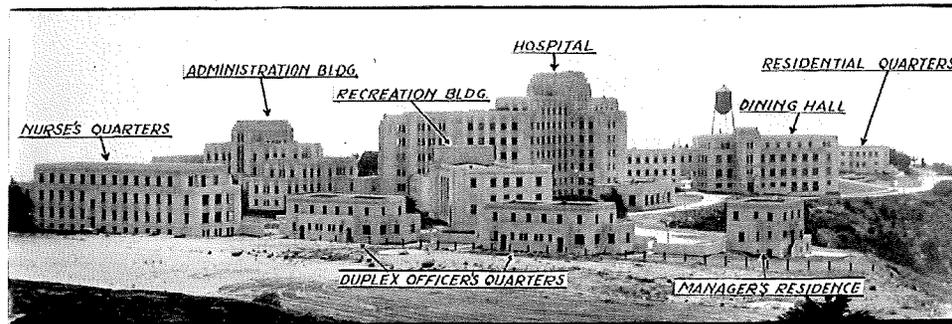


Figure 2: C.1934 view of the Fort Miley Campus looking north. Note Building 8 at the left identified as "Nurse's Quarters" and Building 20 was not yet constructed.
Source: San Francisco Public Library.

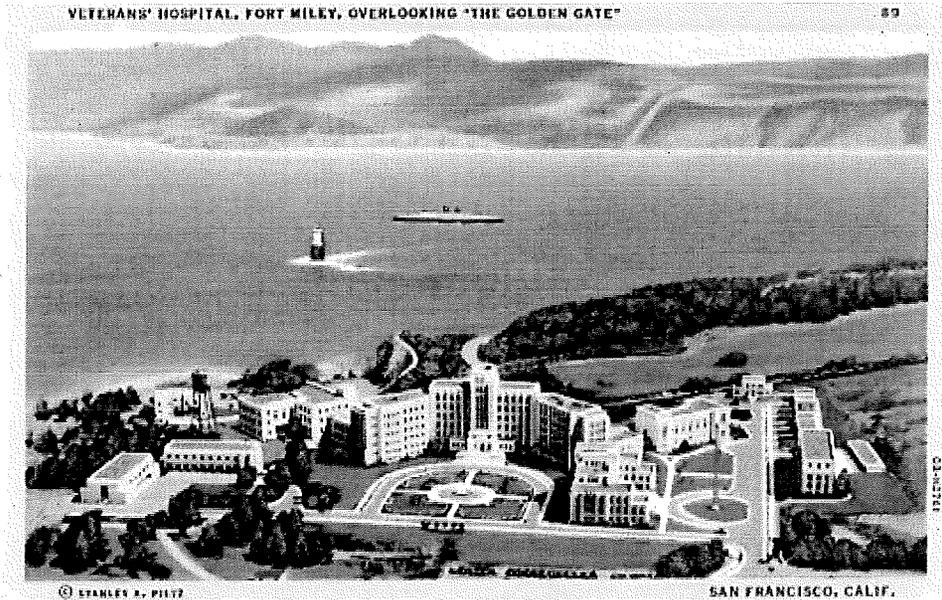


Figure 3: C. 1940 postcard of the Fort Miley campus. Note Buildings 8 and 20 located at the far right.
Source: San Francisco Public Library.



Figure 4: View of the proposed project site (behind Building 8) from Building 1 looking northeast toward Veterans Drive, Building 8 and the Fort Miley Military Reservation Historic District.



Figure 5: View of Building 8 looking southeast. Note Building 20 at the left side and Parking Garage 212 at the right.



Figure 6: View of the northwest corner of Building 8 from Veterans Drive looking southeast.



Figure 7: Detail view of the north elevation of Building 8 looking southeast.



Figure 8: View of the southeast corner of Building 8 prior to the construction of Parking Garage 212.



Figure 9: View of southwest corner of Building 20 looking northeast.
Source: SFVAMC HD National Register Nomination.



Figure 10: View toward the east side of Building 8 and the proposed project site
from Fort Miley Military Reservation Historic District.

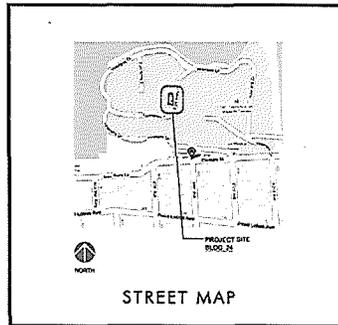
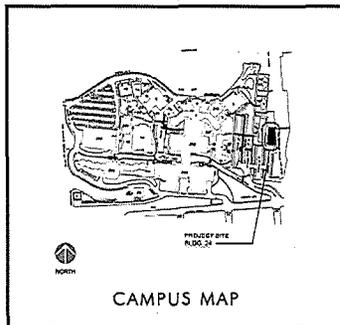


SAN FRANCISCO VA MEDICAL CENTER

MENTAL HEALTH CARE & SLEEP LAB UNIT

4150 CLEMENT STREET, BLDG. 24
SAN FRANCISCO, CA 94121

PROJECT NO.: 662-607



SHEET INDEX

- 1 COVER PAGE
- 2 SITE PLAN
- 3 BUILDING 24 ELEVATION (WEST)
- 4 BUILDING 24 ELEVATION (EAST)
- 5 VIEW FROM SE CORNER BUILDING 7
- 6 VIEW FROM FT. MILEY CIRCLE
- 7 VIEW FROM FT. MILEY CIRCLE - TRANSPARENT IN FOREGROUND
- 8 VIEW FROM ADJACENT NATIONAL PARK SERVICE PROPERTY



SHEET 3

BUILDING 24 ELEVATION (WEST)

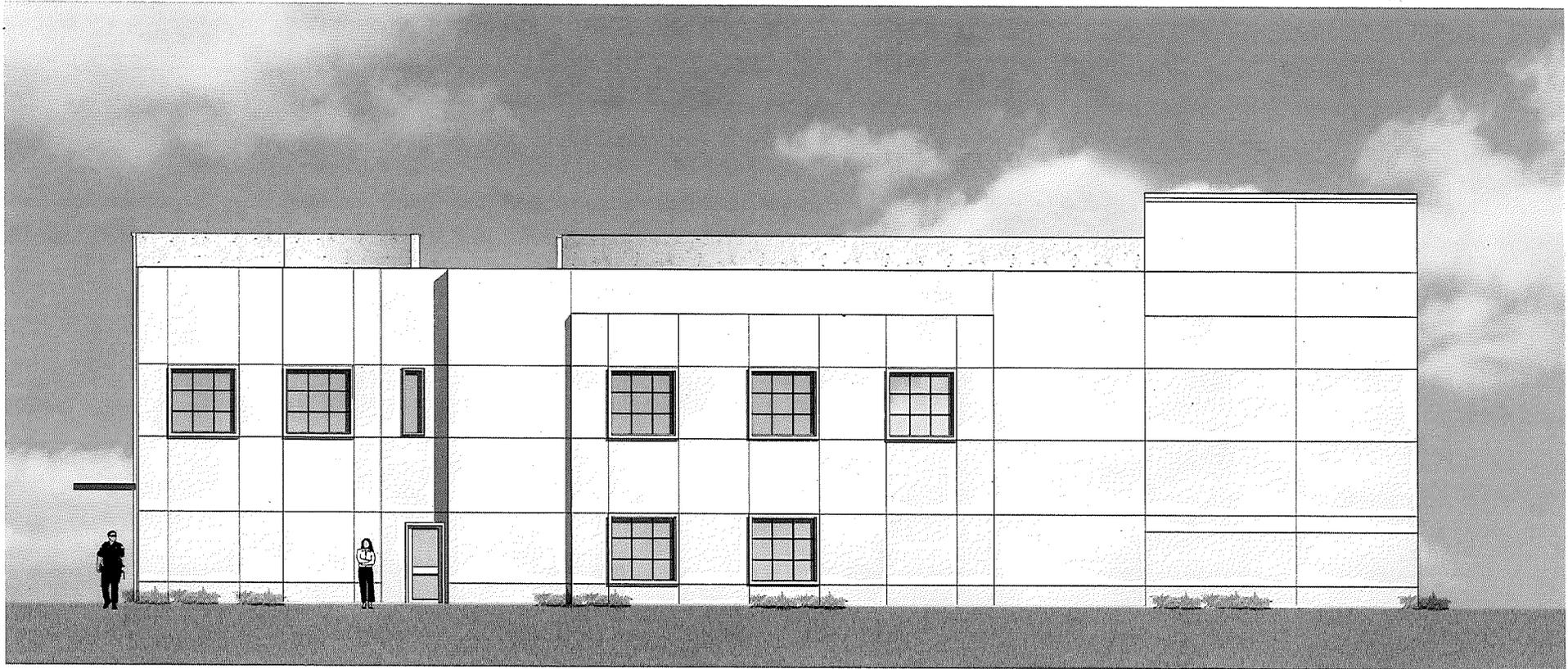
MENTAL HEALTH CARE & SLEEP LAB UNIT

SAN FRANCISCO VA MEDICAL CENTER
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PROJ. NO. 662-607



eCIFM SOLUTIONS Inc.

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SHEET 4

BUILDING 24 ELEVATION (EAST)

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SHEET 5

VIEW FROM SE CORNER BUILDING 7

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SHEET 6

VIEW FROM FT. MILEY CIRCLE

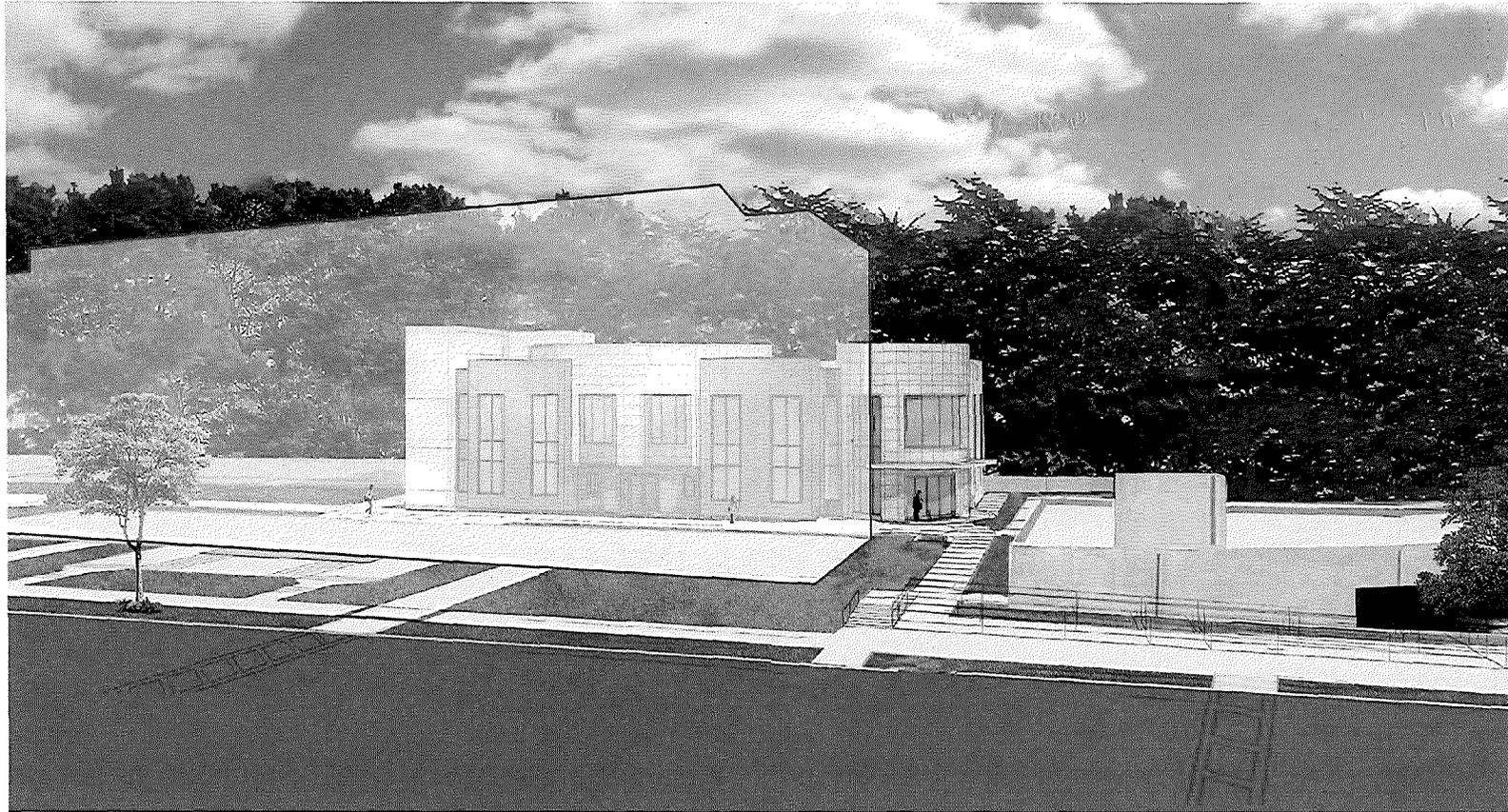
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SHEET 7

VIEW FROM FT. MILEY CIRCLE - TRANSPARENT IN FOREGROUND

MENTAL HEALTH CARE & SLEEP LAB UNIT

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SHEET 8

VIEW FROM ADJACENT NATIONAL PARK SERVICE PROPERTY

MENTAL HEALTH CARE & SLEEP LAB UNIT

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